

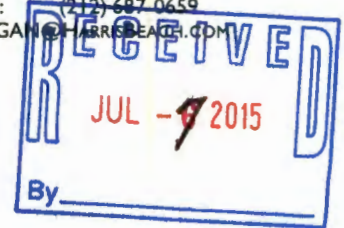
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June 30, 2015

**VIA FIRST CLASS MAIL**

National Freedom of Information Officer  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2822T)  
Washington, DC 20460

Re: *TCI of New York, LLC, et al v. Power Substation Services, LLC, et al*  
Index No. 6566/2013  
Our File No.: 262607

**FREEDOM OF INFORMATION ACT REQUEST**

Dear Sir or Madam:

We represent Power Substation Services, LLC in the above-referenced litigation.

Pursuant to the provisions of the Freedom of Information Act ("FOIA"), we hereby request copies of all documents,<sup>1</sup> correspondence, filings, permits, violations issued against, and other publicly available information regarding the following entities:

- TCI of New York, LLC;
- TCI Realty of New York, LLC; and
- KMOJ Acquisition LLC.

We are prepared to pay for any copying costs associated with your agency's response to this FOIA request. We request this information in order to evaluate Plaintiffs' claims in their lawsuit against our client. We would therefore appreciate a response as soon as possible and look forward to hearing from you shortly. If for any reason any portion of this request is denied, please inform our office of the reasons for the denial in writing and provide the name and address of the person or body to whom an appeal should be directed.

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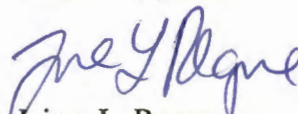
<sup>1</sup> "Documents" shall mean all original writing or records of every type and description (including any electronic data, compilation from which information can be obtained or translated through detection devices into reasonably useable form) that are or have been in the possession, custody or control of EPA or of which EPA has knowledge, including without limitation, computer disk, computer software, correspondence, memoranda, tapes, stenographic or handwritten notes, studies, photographs, pictures, films, voice recordings, maps, reports, surveys, charts, blueprints, minutes or statistical compilations, and computer printouts.

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Please feel free to contact the undersigned should you have any questions, or need additional information regarding this FOIA request.

Very truly yours,



Jaime L. Regan